

Richard W. Pierce
Richard W. Pierce, Law Office, LLC
P.O. Box 503514
Saipan, MP 96950-3514
Telephone: (670) 235-3425
Facsimile: (670) 235-3427

Attorney for Yun's Corporation and Town, Inc.

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

YUN'S CORPORATION and
TOWNHOUSE, INC.,

Defendant(s).

Civil Action No. 07-0031

DEFENDANTS' CASE
MANAGEMENT CONFERENCE
STATEMENT

Date: April 14, 2008

Time: 9:00 A.M.

Hon. Alex R. Munson

Yun's Corporation ("Yun's") and Town, Inc. ("Townhouse") file their Case Management Conference ("CMC") Statement in this matter.

This litigation ought to follow a modified Standard Track because, in line with LR 16.2CJ(c)(2)(b), discovery will be relatively routine, discovery will require up to ten fact witnesses, the trial will likely last from five to ten days, and the character and nature of damages is relatively routine.

1. Factual Information:

a. The EEOC maintains that Yun's and Townhouse engaged in unlawful employment practices against Suzette Divina-Cruz, and other similarly situated women by terminating them, failing to renew their employment contracts, and/or discriminating against them on the basis of their gender (female) and

1 pregnancies in violation of Title VII of the Civil Rights Act of 1964, as amended,
2 the Pregnancy Discrimination Act of 1978, and Title I of the Civil Rights Act of
3 1991.

4 b. Yun's and Townhouse maintain that each has treated its
5 pregnant employees and potential employees the same as similarly situated non-
6 pregnant employees and potential employees and in good faith acted to impose
7 Title VII standards in hiring and/or retention decisions and work place conditions.

8 2. CMC Statement:

9 a. All parties have been served.

10 b. Jurisdiction and venue lie in this Court.

11 c. Yun's and Townhouse retain the right to file motions for
12 summary judgment and/or partial summary judgment.

13 d. Yun's and Townhouse do not anticipate the need for any
14 special procedures, including consolidation.

15 e. Yun's and Townhouse do not anticipate the need for any
16 modifications of standard pretrial procedures on account of the relative simplicity
17 or complexity of the action, except for the possible need for depositions in other
18 countries. Yun's and Townhouse request a Standard Track and a trial date beyond
19 the regular 12 month date in Standard Track cases due to the possibility that
20 potential witnesses may be in other jurisdictions.

21 f. Yun's and Townhouse believe that EEOC did not engage in
22 statutorily required conciliation efforts prior to filing suit in this matter. Yun's and
23 Townhouse are not amenable to settlement discussions at this time.

24 Respectfully submitted,

25 RICHARD W. PIERCE LAW OFFICE, LLC

26 Date: April 3, 2008

27 _____/s/_____
28 Richard W. Pierce
Attorney for Yun's Corporation and Town, Inc.